



Re: Libby OU3
Deborah McKean to: Bonita Lavelle

1135488 - R8 SDMS

01/11/2010 01:00 PM

Thank you for the info. As a new person in the group, it is difficult to get a handle on the sequence of events that brought us to where we are today and the rationale for some of the current efforts. So, yes, this information is helpful and yes, I would love the opportunity to talk with you a length sometime soon to get your impressions on Libby and to understand better what you need to make your Libby-life easier.

As to the issue at hand, I agree that you need internal Region 8 support in addition to contractor support. It seems that the sampling plan was a learning experience. Perhaps Grace used that opportunity to imply a lack of technical ability on the EPA side of the fence, but we need to move forward in as positive a way as possible to get the job done.

As time goes on, we can, together, figure out the best mechanism for getting you the expertise you need for each of the facets of the project.

Looking forward to working with you and, again, thanks for the info.

Deborah L. McKean, Ph.D.
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-----Bonita Lavelle/R8/USEPA/US wrote: -----

To: Deborah McKean/R8/USEPA/US@EPA
From: Bonita Lavelle/R8/USEPA/US
Date: 01/06/2010 05:35PM
Subject: Re: Libby OU3

Dear Deborah,

The communication happened several times last year (2009):

During the spring surface water sampling program, I worked with EPA contractors to develop a sampling plan. For specific reasons, the plan called for acid preservative in the sample bottle and various sample preparation steps. When we got initial analytical results back, Grace pushed hard for some pilot testing of the plan. The results of the pilot indicated that LA exists in both a freely suspended form and also in clumps of organic material in the surface water. We now aren't sure if our prep and analytical methods provide accurate results. In other words, the prep steps we called for probably characterize the total amount of fibers by breaking up the clumps before filtering, but we need other techniques to quantify the amount of fibers that exist in the environment in clumps. In several phone conversations, Grace questioned our expertise in specifying the prep and analysis methods for this program and whether we know what we're doing in analysis of water samples.

Then, in the summer during the time Grace was implementing the activity based sampling program EPA developed as part of the Phase III Remedial Investigation, they found our design was not implement-able. We specified too great a volume of air to be drawn through the pumps because we called for one sample to be collected over a duration of 180 minutes and 5 activities. This resulted in overloaded filters and in some cases, blown and torn filters. Grace subsequently implemented a pilot study that tested several pumps and alternative designs until we found one that worked.

W.R. Grace spent a lot of resources on the pilot study (it costs money to fly field crews to Libby, it's tough to work in OU3 and the number of samples collected was way more than we had planned for). This led them to question who I had working on the sampling plan and whether I have sufficient technical help and whether they have the right experience and expertise. This was in a phone conversation.

The lessons I learned are that I can't rely solely on EPA contractors - I need expertise within Region 8 to help oversee EPA contractors' work and to help with plan development and implementation. That's why I've been increasingly concerned about the loss of more scientists in support of the Libby project. The right combination of experience, expertise and knowledge of EPA guidance and policy are critical throughout planning, implementation, and evaluation of results.

I hope this helps. Let me know if you want to talk further about it. Thanks for being concerned enough to follow up.

Bonnie

Deborah McKean---01/05/2010 02:26:04 PM---Bonnie: I just learned that you have received some sort of communication from WR Grace indicating t

From: Deborah McKean/R8/USEPA/US
To: Bonita Lavelle/R8/USEPA/US@EPA
Date: 01/05/2010 02:26 PM
Subject: Libby OU3

Bonnie:

I just learned that you have received some sort of communication from WR Grace indicating that you are not receiving the technical support that you require for OU3. Can you tell me what kind of support is in question?

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